

R E M A R K S

This is a full and timely response to the Office Action mailed March 22, 2007.

Applicants believe that the currently pending claims are not anticipated by or obvious over the cited references for at least the reasons set forth below and respectfully request reconsideration.

Claim Rejections - 35 U.S.C. 103(a)

Claims 21 and 26-31 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Abe, U.S. Patent Application No. 2001/0030694 in view of Haavisto, U.S. Patent Application No. 2001/0007470. Claims 22-25 and 32-40 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Abe in view of Haavisto and further in view of Ikeda, U.S. Patent Application No. 2002/0018129.

Claims 21-40 are believed allowable at least because Abe, Haavisto and Ikeda, taken singly or in combination, do not disclose or suggest "a second analog processing and A-D conversion unit configured to receive the second set of RGB values and generate in response thereto, a set of average RGB signals". Haavisto receives two analog signals from LEDs, logarithmically compresses each signal, subtracts them, and amplifies the difference, all in the white balance unit, and it is this amplified difference that is converted in an A-D converter 56. (See paragraphs 34, 38 and 39.) Clearly, a **set of average RGB signals** is not generated by Haavisto. Rather, even assuming, arguendo, that Haavisto's A-D converter 56 is averaging signals to generate an average output signal, Haavisto does not disclose or suggest creating **a set of**

Appl. No. 10/797,308

average RGB signals from which a white balance unit generates white balance information. Haavisto combines all input signals to create a **single** amplified analog difference signal **before** the signal reaches the A-D converter 56, and therefore does not generate a set of average RGB signals.

In view of the above, all of the claims are believed to be in condition for allowance, and Applicants respectfully request that a timely Notice of Allowance be issued.

Respectfully submitted,
KLAAS, LAW, O'MEARA & MALKIN, P.C.

By: /Guy K. Clinger/
Guy K. Clinger, Esq.
Registration No. 42,422
1999 Broadway, Suite 2225
Denver, CO 80202
(303) 298-9888
Fax: (303) 297-2266

I hereby certify that this paper is being electronically transmitted to the Commissioner for Patents on the date shown below:

Date of transmission: June 22, 2007
Signature: /Guy K. Clinger/